

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-LPS
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**STIPULATION AND ORDER TO PERMIT DEPOSITIONS TO BE
TAKEN AFTER THE CLOSE OF FACT DISCOVERY**

WHEREAS Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (“Plaintiffs”) issued on February 9, 2022, a Notice of Deposition to Sean Shafik (“Notice of Deposition to Shafik”);

WHEREAS, Defendant ROSS Intelligence, Inc. (“Defendant”) has accepted service of the Notice of Deposition to Shafik;

WHEREAS, Defendant issued on February 25, 2022, a Notice of Deposition to Morae Global Corporation (“Notice of Deposition to Morae”);

WHEREAS, third-party Morae Global Corporation has accepted serviced of the Notice of Deposition to Morae;

WHEREAS, Defendant issued on March 22, 2022, an Amended Notice of Deposition to LegalEase Solutions, LLC (“Amended Notice of Deposition to LegalEase”);

WHEREAS, third-party LegalEase Solutions, LLC has accepted service of the Amended Notice of Deposition to LegalEase;

WHEREAS, Defendant issued on March 22, 2022, an Amended Notice of Deposition to Tariq Hafeez (“Amended Notice of Deposition to Hafeez”);

WHEREAS, third-party Tariq Hafeez has accepted service of the Amended Notice of Deposition to Hafeez;

WHEREAS, Defendant issued on February 17, 2022, a Notice of Deposition to Isabelle Moulinier (“Notice of Deposition to Moulinier”);

WHEREAS, Plaintiffs have accepted service of the Notice of Deposition to Moulinier;

WHEREAS, Defendant issued on February 17, 2022, a Notice of Deposition to Cameron Tario (“Notice of Deposition to Tario”);

WHEREAS, third-party Cameron Tario accepted service of the Notice of Deposition to Tario;

WHEREAS, the deadline for fact discovery is April 21, 2022. *See* Text Order at 11/12/2021 (stating that “Fact Discovery [shall be] completed by April 21, 2022”);

WHEREAS, Plaintiffs and Defendant have been working diligently to schedule the deposition of Sean Shafik and agree to permit the deposition to occur one day after the close of fact discovery, on April 22, 2022;

WHEREAS, Plaintiffs and Defendant have been working diligently to schedule the depositions of Morae Global Corporation, Tariq Hafeez, LegalEase Solutions, LLC, Cameron Tario, and Isabelle Moulinier and agree to permit the depositions to occur following April 21, 2022 on a date to be agreed on by the parties;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiffs and Defendant, subject to the approval of the Court, that

- The deposition of Sean Shafik may be taken on April 22, 2022.
- The deposition of Cameron Tario may be taken on April 27, 2022.

- The deposition of Morae Global Corporation may be taken following April 21, 2022 on a date to be agreed on by the parties.
- The depositions of Tariq Hafeez and LegalEase Solutions, LLC may be taken following April 21, 2022 on a date to be agreed on by the parties.
- The deposition of Isabelle Moulinier may be taken following April 21, 2022 on a date to be agreed on by the parties.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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Attorneys for Defendant ROSS Intelligence Inc.

IT IS SO ORDERED this ____ day of _____, 2022.

The Honorable Leonard P. Stark

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